



DEPARTMENT OF THE TREASURY  
WASHINGTON, D.C. 20220

May 15, 2020

The Honorable Marcy Kaptur  
U.S. House of Representatives  
Washington, DC 20515

Dear Congresswoman Kaptur:

I write in reply to your April 20, 2020 letter inquiring about the Toledo Metropolitan Area Council of Governments' (TMACOG) application to the Department of the Treasury to receive direct payment from the Coronavirus Relief Fund (CRF).

Treasury began disbursing CRF assistance to states on April 15, 2020 and to local governments on April 19, and all funds for states and local governments were disbursed by April 24—ahead of the April 26 statutory deadline. The Coronavirus Aid, Response, and Economic Security (CARES) Act allows for local governments with a population over 500,000 people to apply directly to Treasury for CRF funds. In developing the methodology for determining which local governments were eligible to apply directly to Treasury for CRF funds, the Department relied on data from the U.S. Census Bureau, and the eligible units of local government were posted on Treasury's website.

Treasury determined that Councils of Government (Councils), like TMACOG, were not units of local government eligible to receive payments from CRF. It is very unlikely that Councils will have a large amount of necessary unbudgeted expenditures incurred due to the COVID-19 public health emergency. Furthermore, the unavailability of population data at the Council level from the Census Bureau posed an administrative challenge. The statute required Treasury to make payments within 30 days of enactment of the CARES Act and to use the most recently available Census Bureau data. Treasury would have had to determine which cities, towns, municipalities, etc. were members of such Councils and aggregate the total population amounts based on the Census Bureau data. This work would have had to be completed in time to permit such governments to elect to receive funds so that Treasury could make necessary adjustments to the relevant state's allocation prior to the statutory deadline.

If you have further questions, please direct your staff to contact the Office of Legislative Affairs.

Sincerely,

Frederick W. Vaughan  
Principal Deputy Assistant Secretary  
Office of Legislative Affairs

cc: The Honorable Sherrod Brown

